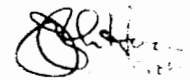


FILED

MAR 19 2015



UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CR14-40038

Plaintiff,

FACTUAL BASIS STATEMENT

vs.

ELIJAH WILSON,
a/k/a "elijahwilson1989@gmail.com"

Defendant.

The undersigned parties stipulate that the following facts are true and establish a factual basis for the plea in the action pursuant to Federal Rules of Criminal Procedure 11(b)(3):

On March 20, 2014, law enforcement in Sioux Falls, SD, initiated a sting operation by placing an ad on backpage.com which offered a "unique weekend opportunity" involving "2 very special little gurlz."

Defendant Elijah Wilson responded to the ad by email from his Sioux Falls residence using a Blackberry cell phone shortly after 5:00 p.m. Over the course of the next hour, police emailed Wilson small age-regressed photographs of two adult female officers who were described as being 13 years old. Law enforcement and Wilson discussed money.

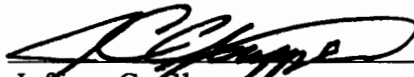
A little after 6:00 p.m., Wilson left his residence and drove to the vicinity of a truck stop on North Cliff Avenue where officers were trying to set up a

meeting. For the next four hours, Wilson drove around the area and kept in sporadic contact with officers by voice and text using a Kyocera cell phone. One text contains a sexually explicit reference by Wilson. Although Wilson never met up with the officers at the truck stop, officers eventually pulled him over and arrested him.


Wilson was then interrogated at the Sioux Falls Public Safety Building beginning at approximately 10:45 p.m. that night. During the course of the interrogation, Wilson told officers he was attempting to hire the advertised females in order to transport them from South Dakota to a party which was to take place in Des Moines, Iowa. All of this occurred in violation of 18 U.S.C. 2423(b) and (e).

BRENDAN V. JOHNSON
United States Attorney

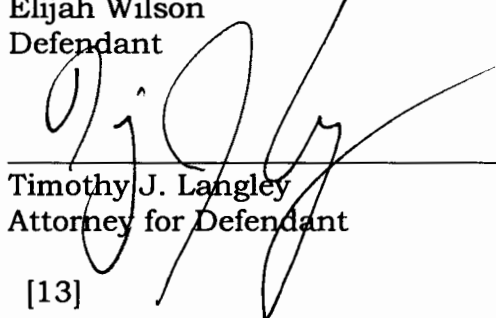
March 19, 2015
Date


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03/17/15
Date


Elijah Wilson
Defendant

3/17/15
Date


Timothy J. Langley
Attorney for Defendant